IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

Rinne Corp,

Plaintiff.

v.

Case No. 1:23-cv-16232

The Partnerships, and Unincorporated Associations Identified in Schedule A,

Defendants.

Honorable Judge Jeffrey I. Cummings

DECLARATION OF BAOHUA ZHANG

- I, Baohua Zhang, declare as follows:
- 1. I am an employee of Zero-Miracle Network Limited (**Zero**), which operates the internet store, cheap-easy-go.com (the **Store**), identified in this lawsuit. In this capacity, I have personal knowledge of the Store's operation and sales and have access to Zero's business records.
- 2. I make this declaration based on my personal knowledge and after reviewing Zero's business records. If called as a witness, I can competently testify to the matters stated herein.
- 3. Zero is incorporated and has its principal place of business in China. Zero operates the Store exclusively in China. Zero has never owned or utilized an office, hired employees, agents, or representatives, maintained bank accounts, owned assets or properties, or qualified to do business in Illinois or any other part of the United States.
- 4. Neither the Store nor Zero has targeted Illinois residents with their advertisements, nor directed any marketing efforts or materials at Illinois.
- 5. Rinne Corp (the **Plaintiff**) alleges the Store has infringed on its copyrights and trademarks. Specifically, Plaintiff's counsel has provided the attached **Exhibit A**, which shows the

allegedly infringing products (collectively, Alleged Products).

- 6. After reviewing the complaint and Exhibit A provided by counsel, I conducted a diligent search of the Store's sales records for the Alleged Products. **Exhibit B** contains complete and accurate sales records, maintained in the ordinary course of Zero's business.
 - 7. Exhibit B shows that the Store has made no sale of the Alleged Products in Illinois.
 - 8. The Store has made only one sale of the Alleged Products in the entire U.S.
- 9. The Store received an email regarding this lawsuit. However, the email did not contain a link to a website where relevant documents in this matter would be published.
- 10. There are many similar mousetrap products for sale online. A brief search reveals numerous similar pictures and sales links for such products. Many listings use product descriptions of "flip and slide." *See* Exhibit C.
- 11. The Store initially listed the Alleged Products for sale in or before February 27, 2022. Before this litigation, the Store was not aware, nor had any reason to be aware, that it could be infringing any copyrights or trademarks. The Store has not attempted to market or pass off its products as those of the Plaintiff or any other party.
- 12. The Store uses Paypal account, zeromiraclepp@outlook.com, for the Alleged Products, which now has a frozen amount of \$3,512,500.22 due to the asset restraints imposed by this litigation.
- 13. The Store still plans to continue business operations. However, the existing restraints significantly hinder the Store's liquidity and ability to maintain normal operations.
- 14. Upon notice of the current litigation, Zero has permanently removed the listings of the Alleged Products. While Zero is moving to challenge the Preliminary Injunction Order (Dkt. 41), Zero assures the court it will not relist the Alleged Products for sale until further ordered by the court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.

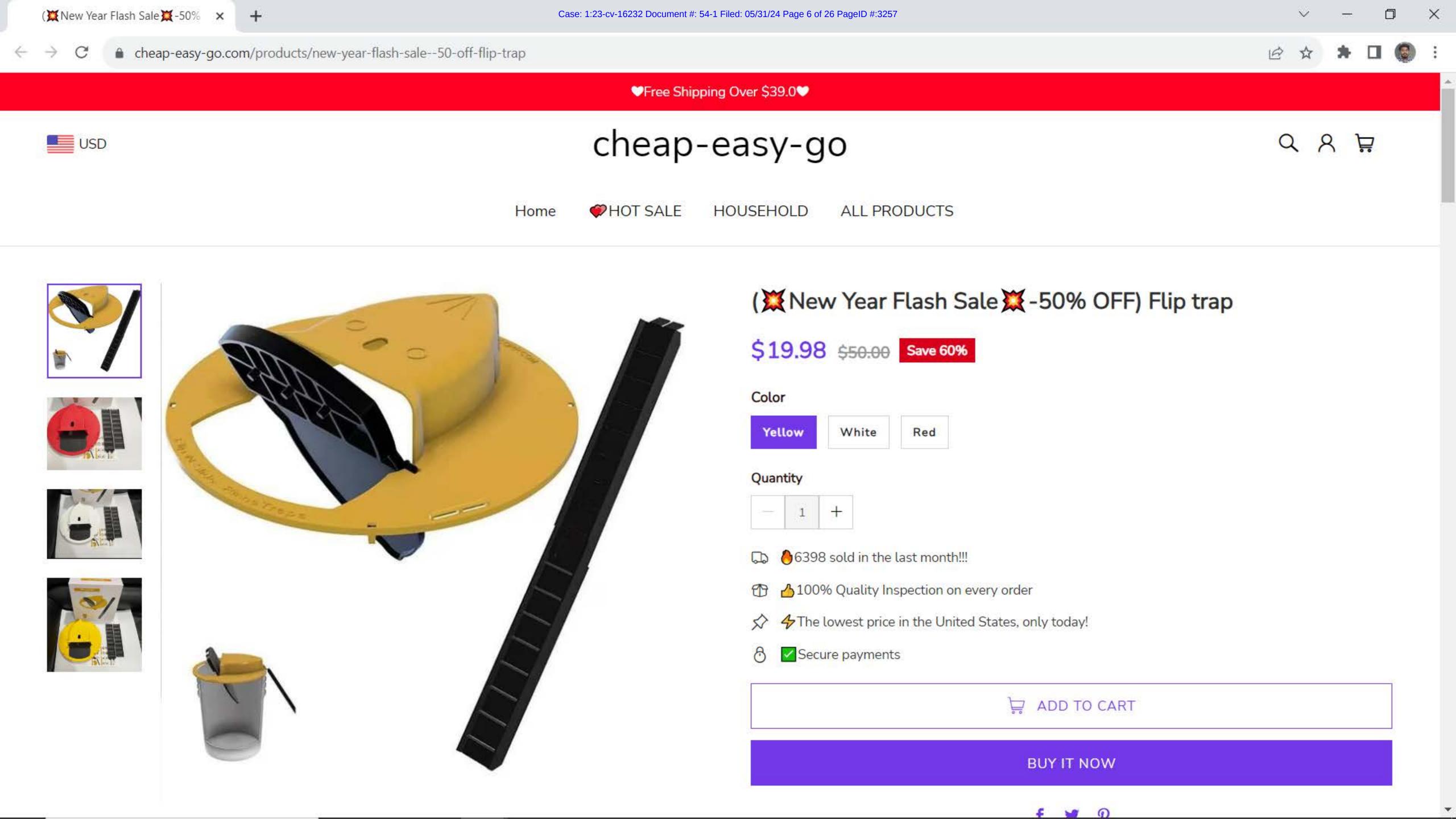
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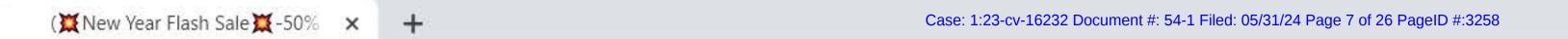
Executed on this 27th day of May, 2024. in Nanchang, Jiangxi, China.

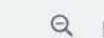
Dated: May 27, 2024

By: Baohha 2hang Baohua Zhang

EXHIBIT A













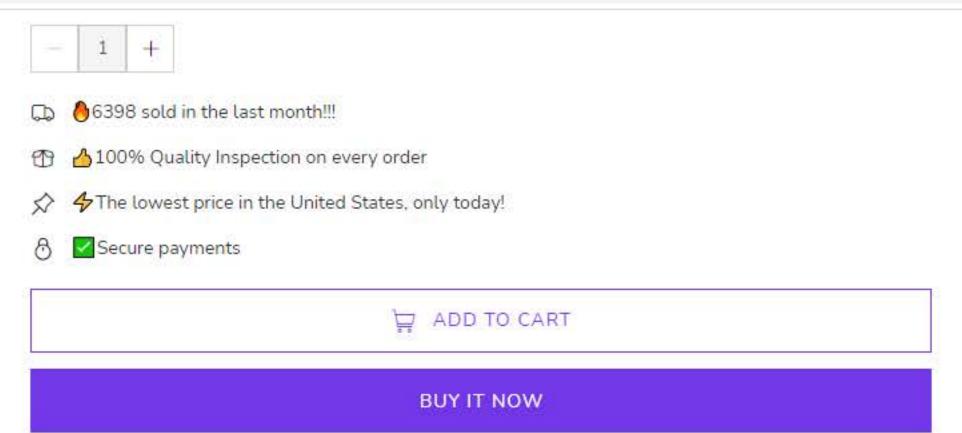




♠ cheap-easy-go.com/products/new-year-flash-sale--50-off-flip-trap







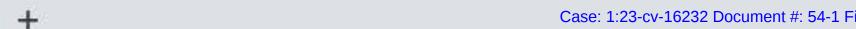
PROVEN HIGHER CATCH RATE

In a quantitative test, we set up 5 different traps in a barn infested with Mice. We used the same bait for each and set them up all in a row in order to receive accurate results. The test concluded that the Flip N Slide had beaten the other "Multi Catch" traps by almost 4X



HOW IT WORKS?

Turn an ordinary 5-gallon bucket into the best trap on the market. No more dealing with 1-time use traps that are often ineffective and unsanitary. With our new Flip N' Slide bucket lid all you have to do is snap it onto a standard-sized 5-gallon bucket and boomyou're catching mice and rats.



♠ cheap-easy-go.com/products/new-year-flash-sale--50-off-flip-trap













- ·Inhumane: Glue Traps take days for a mouse to eventually die of hunger, stress, or dehydration.
- · Unsanitary: The CDC has warned against the use of these traps due to the threat of the deadly disease "The hantavirus"



- · Unsanitary: Picking up a dead mouse that has been crushed poses many risks of disease.
- · Unsafe: There have been hundreds of cases where a family pet or a child has been very badly injured from this style trap.
- · Not efficient : With any snap trap design you can only catch 1 mouse at a time.

WHAT'S INCLUDED?

✓ Flip Slide Bucket Lid

✓ Flip Slide Counter Weighted Plank

✓ 2 Piece Ramp

✓ Instructional Guide

(NOTE): 5 Gallon Bucket is NOT included



(XX New Year Flash Sale XX -50% ×

(X New Year Flash Sale X -50%... \$19.98 \$50.00

Color

Quantity

Yellow

BUYIT NOW













FREQUENTLY ASKED QUESTIONS

Does it only work for Rat and Mice?

You can catch any type of small rodent, Given you use the correct bait.

What to do with a bucket full of mice?

If you want the trap to be lethal, simply half fill the bucket with water. If not, do not put anything inside A after every catch, go and release them somewhere far away from your house. Let nature do the rest.

Doesn't the bait fall in with the mouse? Would you have to reload every time?

Quantity



(XX New Year Flash Sale XX −50% × +

♠ cheap-easy-go.com/products/new-year-flash-sale--50-off-flip-trap

(X New Year Flash Sale X -50%... \$19.98 \$50.00

Color Yellow

BUYIT NOW

- Automatically resets and holds upwards of 30 mice and 10+ medium-sized Rats; Unlike conventional traps which only catch 1 or 2
- No mess that you must clean up afterward; simply release or dump your friendly intruders outside(F __ away from your house preferably)
- Reusable: You can use our trap repeatedly without having to toss it out.



(X New Year Flash Sale X -50%... \$19.98 \$50.00



BUY IT NOW

cheap-easy-go

♠ cheap-easy-go.com/checkouts/da21d3105f497664a3dd2c1a1bf76c30?step=shipping_method

cheap-easy-go*UK

Cart \ Information \ Chinning \ Dayment

Contact	johndoe789@gmail.com	Change	
Ship to	73 E Lake St. Chicago, 60601 Illinois United States (US)	Change	
nipping m	ethod		
Express Shipping (7-12 days)		\$ 6.99	
O VIP Sh	ipping (3-7days)	\$ 15.99	
Add Sh	ipping Insurance to your order \$ 0.40 🕜		
Return to in	formation Continue to	Continue to payment	

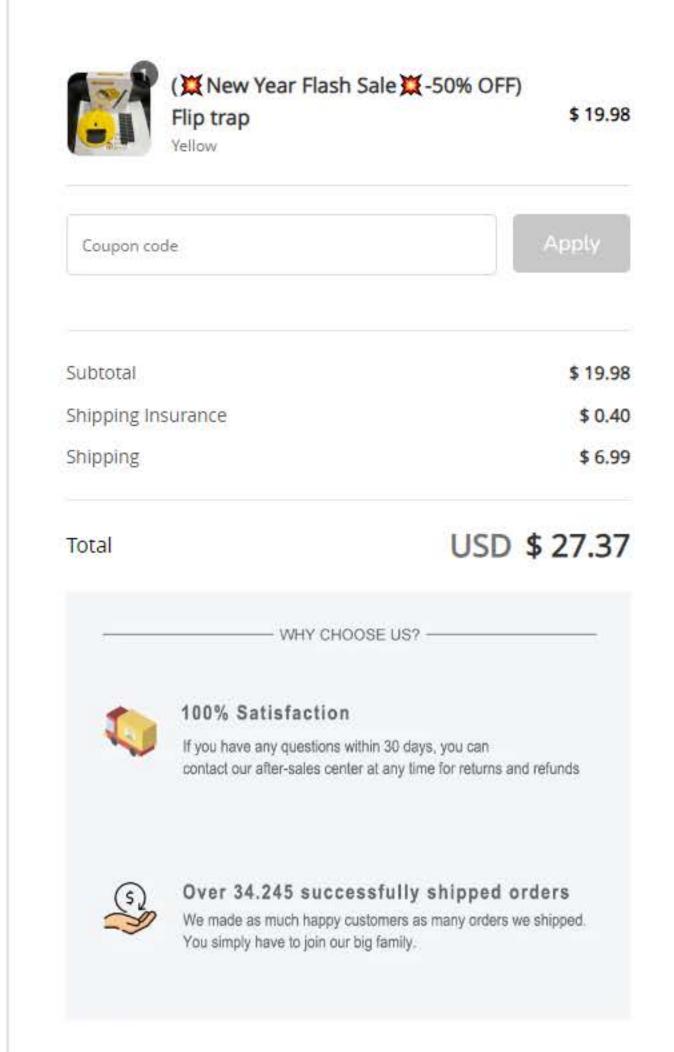
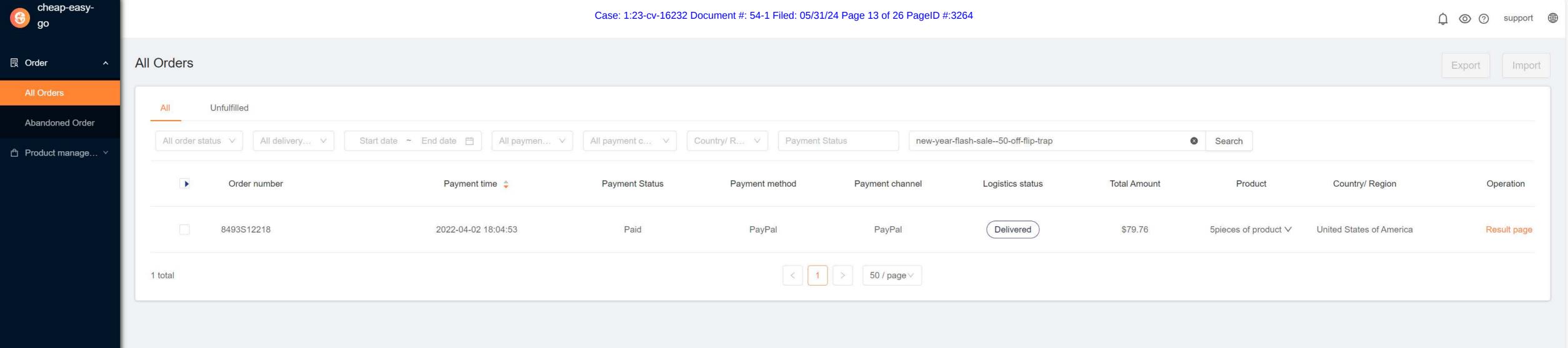


EXHIBIT B

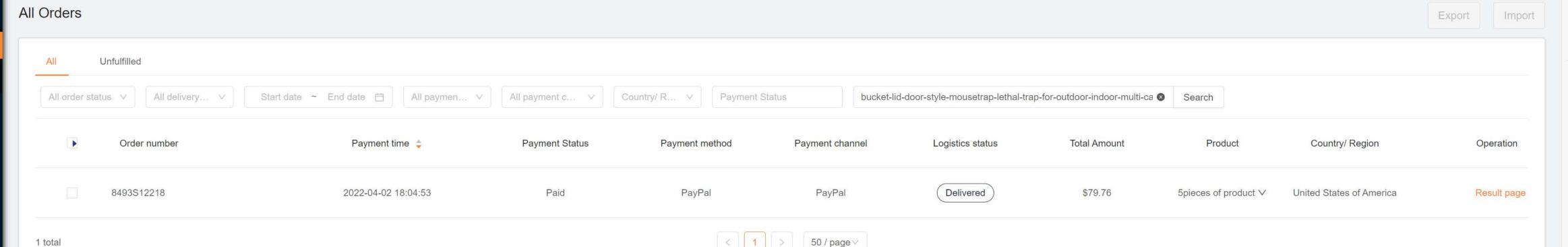




☐ Order

All Orders

Abandoned Order



All Orders

园 Order

Action ▼ Modify delivery



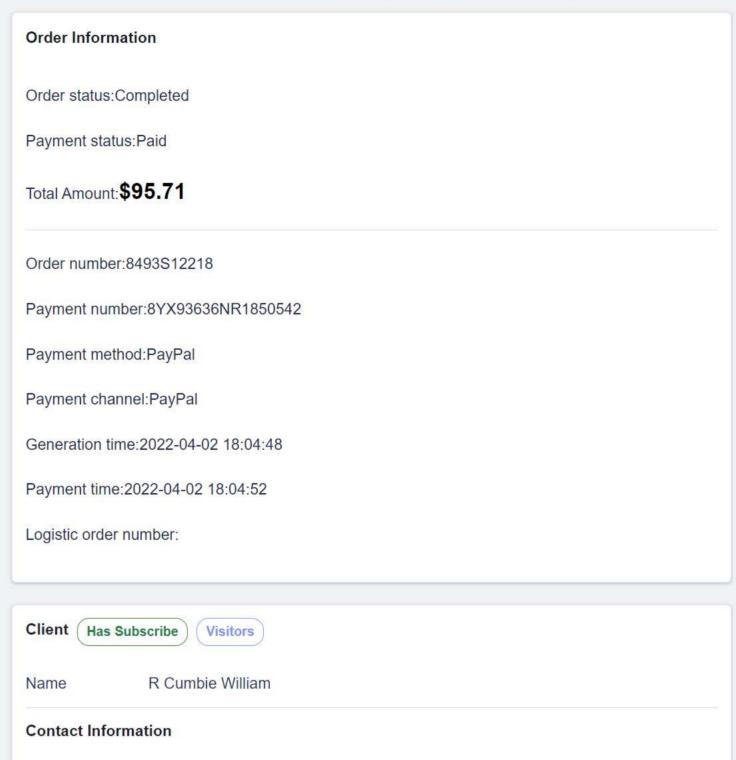
< All Orders

Order Details

Abandoned Order







Mailbox

harry@harrysmooth.com



EXHIBIT C

Memorial Day: up

Medical Care - Groceries -

Amazon Home

Shop by Room

Garden & Outdoor ▼ Search Amazon

Discover

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Garden & Outdoor

Shop by Style

Home Décor

Furniture

Kitchen & Dining

Bed & Bath

Best Sellers Amazon Basics New Releases Prime Music Customer Service Today's Deals Amazon Home Registry Books Pharmacy Gift Cards Luxury Stores Smart Home Fashion Sell Toys & Games Find a Gift Automotive Computers Coupons

& Orders

Kat Sense: Your Department of Defense

KAT SENSE

★★★☆ 6,882 \$17⁹⁶ \$19.96 √prime



Customers who viewed this item also viewed



Pack 2 Bucket Lid Mouse Trap, 5 Gallon Bucket Compatible, Mouse Catching Tool, Trap Door Style, Multi Catch, Auto Reset, Indoor Outdoor (Wine)

★★★☆☆ 49



Pack 3 Bucket Lid Mouse Rat Trap, Mouse Catching Tool, Trap Door Style, Multi Catch, Auto Reset, Indoor Outdoor, 5 Gallon Bucket Compatible

★★★☆☆ 7

\$2399 (\$8.00/Count)



Arber Traps Bucket Lid Mouse Trap, Fits on 5 Gallon + 12 Pcs Sticky Mouse Traps Glue + 6 Pcs Spring Snap Traps for Mice - Multi Catch Human... ★★★☆☆ 38

Patio, Lawn & Garden > Pest Control > Traps



Roll over image to zoom in

















2 Pack Mice Mouse Trap Bucket Flip Lid, Bucket Lid Mouse Rat Trap Indoor Outdoor, Humane Mouse Trap, Mouse Catching Tool Auto Reset, 5 Gallon Bucket Compatible (Without Barrel)

Brand: KUWSEIY

3.1 ★★★☆☆ × 24 ratings 100+ bought in past month

\$1299 (\$6.50 / Count)

Get Fast, Free Shipping with Amazon Prime

FREE Returns Y

Get \$10 off instantly: Pay \$2.99 \$12.99 upon approval for the Amazon Store Card. No annual fee.

KUWSEIY 2 Pack Color Modern Style Material Plastic

Product 12.17"L x 12.17"W x 2.99"H **Dimensions**

Number of Pieces 1

✓ See more

About this item

- [Bucket Mouse Trap] Automatically resets and holds upwards of 10 mice and 5+ medium-sized Rats. Unlike conventional mouse trap bucket lid which only catches 1 or 2. The test concluded that the multi-catch traps by almost 4x. [5 Gallon Bucket is NOT included]
- [Pet/Children Friendly] Stop purchasing traditional mouse trap which can harm your family pet or even worse harm your children. Our humane mouse trap is 100% safe, please feel free to use it.
- [Easy To Use] Only snap it onto a standard-sized 5 gallon bucket mouse trap and boom your catching mice and rats. Now simple release of the mice far away from your house.

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Buy Now

Amazon

Payment Secure transaction

Add a nift receipt for each

KUWSEIY

Eligible for Return, Refund or Replacement

within 30 days of receipt

Ships from

Sold by

© Update location amazon

Garden & Outdoor - Search Amazon

Home Décor

= All Medical Care - Groceries - Best Sellers Amazon Basics New Releases Prime - Music Customer Service Today's Deals Amazon Home Registry Books Pharmacy Gift Cards - Luxury Stores Smart Home Fashion Sell Toys & Games Find a Gift Automotive Computers

Kitchen & Dining

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Account & Lists -EN.

Garden & Outdoor

Amazon Home

Shop by Room

Discover

Shop by Style

Furniture

Bed & Bath

Celebrate National Small Busin

Returns & Orders

Raid Essentials Flying Insect Light Trap Refills, 2 Light Trap Refill... ★★★★☆ 2,243

Save 5% more with Subscribe & Save

Shop now

Patio, Lawn & Garden > Pest Control > Traps



Roll over image to zoom in













Mouse Trap, Flip and Slide Bucket Lid Mice Rat Trap, for Indoor Outdoor Multi Catch Auto Reset (Size : Black)

Brand: SnOwky

\$3689

Get \$10 off instantly: Pay \$26.89 \$36.89 upon approval for the Amazon Store Card. No annual fee.

Size: Black

Black Yellow White \$36.89 \$36.89 \$36.89 \$36.89

Brand SnOwky Color One Color 516 Grams **Item Weight** Number of Pieces 1

About this item

- [Special Designed] This trap was designed with the intent to be used in a catch and release style, but it is optionable to fill the bucket up with water to
- [Cleaner than ever] No more need to discard dirty mice with glue or traps, which can infect them with a deadly disease. Now, just release/dispose of the mouse without having to go anywhere near the mess.
- [Easy to use] All you have to do is clip it into a standard size 5-gallon bucket and use it to catch rats and mice. No longer handle single-use traps, which are often ineffective and unhygienic.
- [Family Friendly] Stop purchasing traditional mouse traps which can harm your family pet or even worse... your children. Our mouse trap is 100% safe .
- [Reasonable use] We can spread peanut butter in the tunnel of the mousetrap, and the mouse will follow the smell into the tunnel, and fall back into the bucket without getting the peanut butter.

Report an issue with this product or seller





HECO ARMOR

Hanging Wasps

Sponsored ®

Outdoor

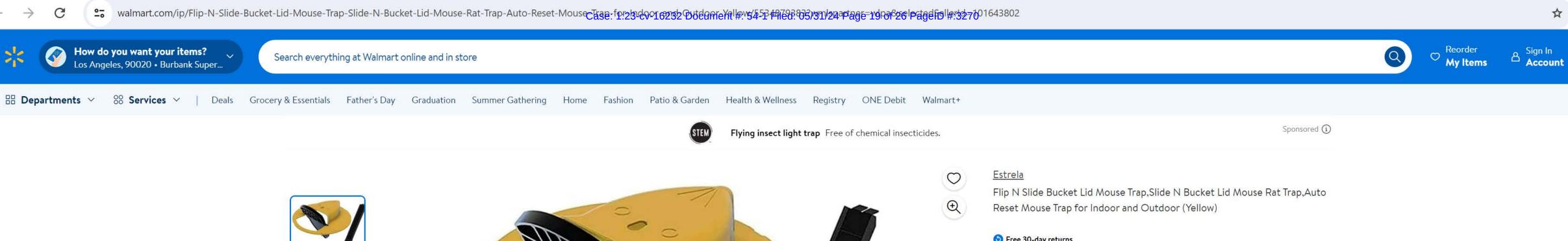
Traps

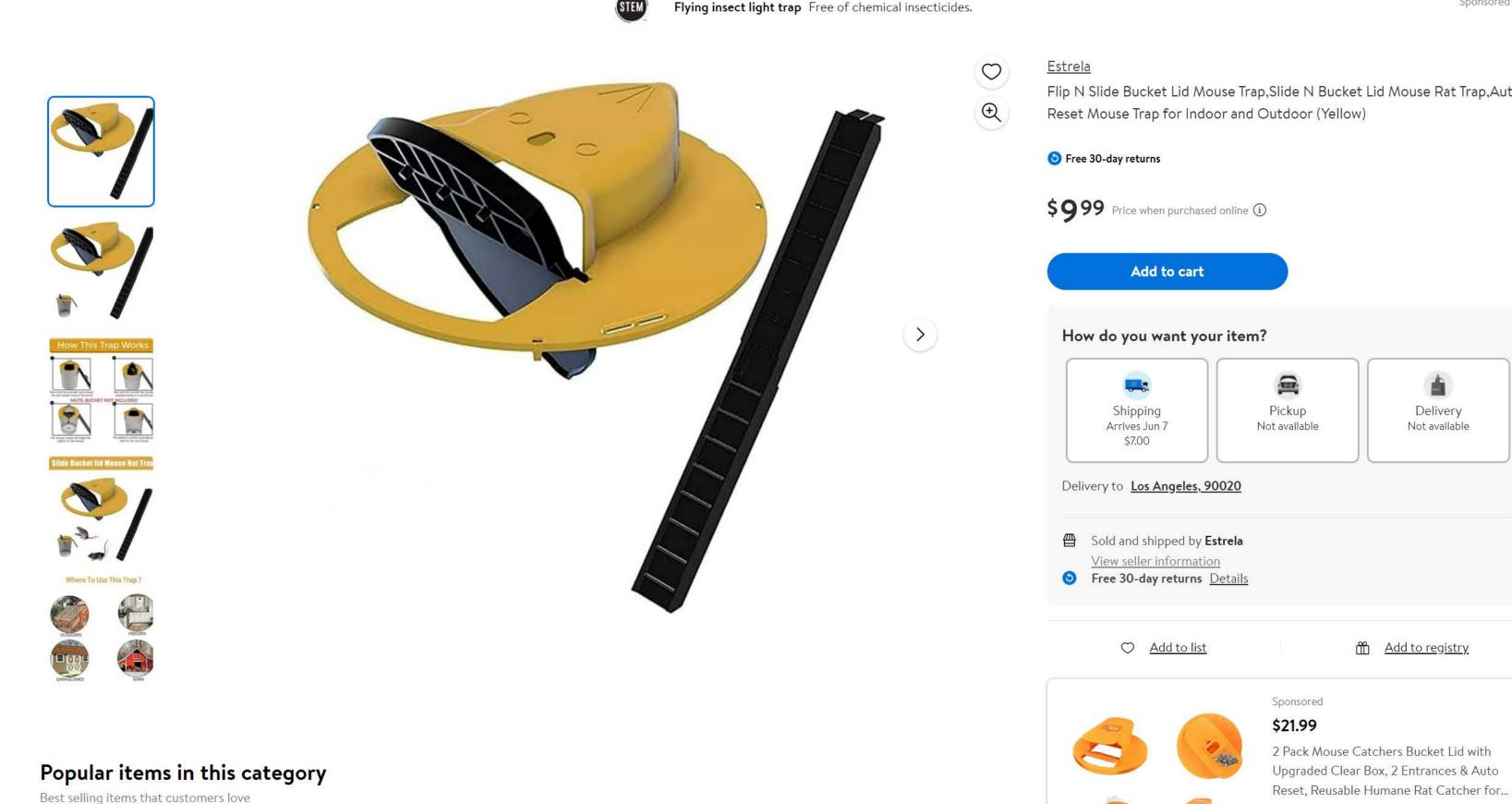
HECO ARMOR Wasp Traps, Outdoo...

★★★☆☆ 69

20% off Limited time deal

\$23⁹⁹ \$29.99 \rime













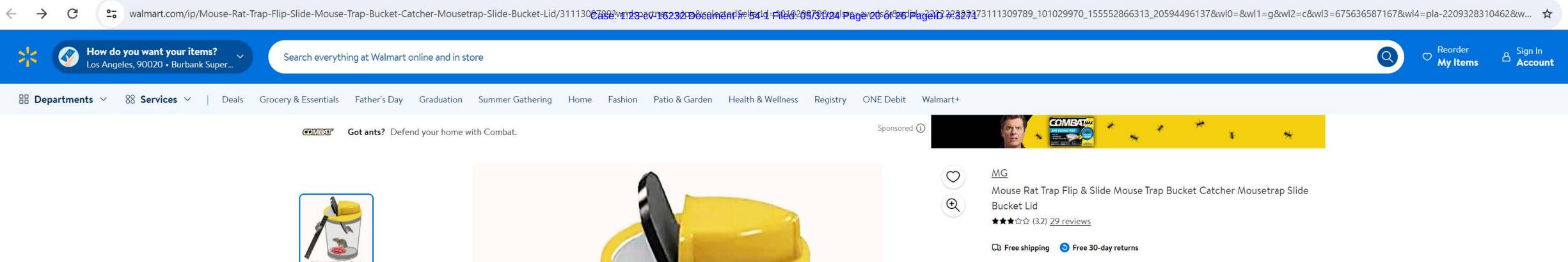


Delivery

Not available

2-day shipping

+ Add



Package does NOT include Bucket

(Trap Lid fits 5 Gallon Bucket)

Q rinnetraps - flip n slide bucket lid mouse trap

Q bucket mouse trap 5 gallon

Continue your search on Walmart

Similar items you might like

Q bucket mouse trap

Q flip and slide mouse trap

Based on what customers bought

Q onebit rat bar poison

Q mouse trap flip bucket top

Reduced price

>

Q rat trap bucket

0

Q mouse tramp

\$995 Price when purchased online (i)

Add to cart

How do you want your item?

Shipping

Arrives May 31

Free

Delivery to Los Angeles, 90020

★★★☆ 103 seller reviews

View seller information

Free 30-day returns Details

Add to list

1

Pickup

Not available

Sponsored

\$37.71

★★★★☆ 134

2-day shipping

Sold and shipped by Alltech Devices, LLC | Pro Seller (1)

Delivery

Not available

Add to registry

Oxgord Live Animal Trap Humane Catch &

Release Cage Cat Rabbit Rodents 2-Door Foldable Heavy Duty Trapping Kit (Large)...

+ Add

Search everything at Walmart online and in store





<



Flying insect light trap Free of chemical insecticides.











How This Trap Works



Mice climb the provided ramp toward the bait located inside of the tunnel

The mouses weight will trigger the

platform to fall forward



Mice will inch out onto the counter weighted platform to eat the bait



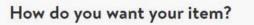
The platform will then automatically reset for the next mouse

Flip N Slide Bucket Lid Mouse Trap, Slide N Bucket Lid Mouse Rat Trap, Auto Reset Mouse Trap for Indoor and Outdoor (Yellow)

Tree 30-day returns

\$999 Price when purchased online (i)

Add to cart









Sponsored (i)

Delivery to Los Angeles, 90020

Sold and shipped by Estrela View seller information

Free 30-day returns Details

Add to list

Add to registry

Sponsored \$21.99

2 Pack Mouse Catchers Bucket Lid with Upgraded Clear Box, 2 Entrances & Auto Reset, Reusable Humane Rat Catcher for...

2-day shipping

+ Add

Popular items in this category

Best selling items that customers love









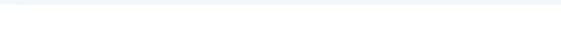
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Search everything at Walmart online and in store



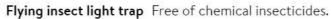


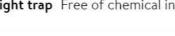




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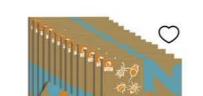


Continue your search on Walmart



Similar items you might like

Based on what customers bought









<u>Aegis</u>

0

2x Mice Trap Reusable Smart Flip and Slide Bucket Lid Mouse Rat trap Auto

★★☆☆ (2.9) 7 reviews

\$1999 Price when purchased online (i)

Add to cart









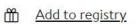
Sponsored (i)

Delivery to Los Angeles, 90020

Sold and shipped by Aegis Inc

★★★★ 84 seller reviews View seller information Free 30-day returns <u>Details</u>

Add to list





\$11.99

HYEASTR Mouse Trap Bucket Flip Lid Mouse Rat Trap Bucket Lid Auto Reset Multi Catch Humane Rat Trap for Indoor...

3+ day shipping

+ Add



Search everything at Walmart online and in store





A Sign In Account



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Prevent bug bites Protection for every day.

Sponsored (i)





HYEASTR

HYEASTR Mouse Trap Bucket Lid (2 Pack) - Humane Flip and Slide Bucket Lid Mouse/Mice/Rat Trap, Auto Reset, Multi Catch Mice Trap Compatible with 5 Gallon Bucket for Indoor/Outdoor/Chicken Coop

★公公公公 (1.0) 1 review

\$1679 Price when purchased online (i)

Add to cart

How you'll get this item:







Add to registry

Los Angeles, 90020 Change

Arrives by Thu, May 30 | More options

Sold and shipped by HYEASTR STORE

★★★☆☆ 3 seller reviews View seller information

Free 30-day returns <u>Details</u>

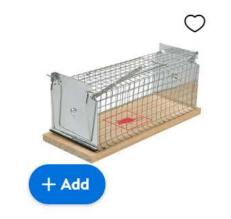
Add to list

Similar items you might like

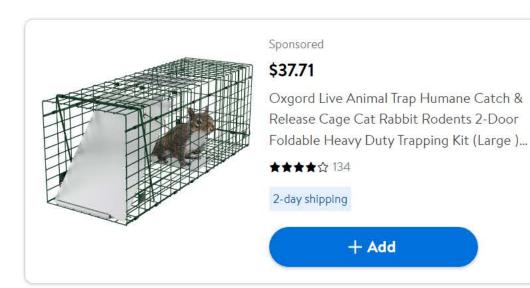
Based on what customers bought











Search everything at Walmart online and in store



🖺 Departments 🗸 👸 Services 🗸 | Deals Grocery & Essentials Father's Day Graduation Summer Gathering Home Fashion Patio & Garden Health & Wellness Registry ONE Debit Walmart+



Feels good on the skin Worry free protection.

0 0

Easy Flip And Slide Bucket Lid Mouse & Humane Rat Trap

\$3999 Price when purchased online ①

Add to cart

How do you want your item?



Pickup Not available

Delivery Not available

Sponsored (i)

Delivery to Los Angeles, 90020

Sold and shipped by The Modern Supply

★★★☆☆ 10 seller reviews View seller information

Free 30-day returns Details

Add to list

Add to registry

Sponsored \$37.71

Oxgord Live Animal Trap Humane Catch & Release Cage Cat Rabbit Rodents 2-Door Foldable Heavy Duty Trapping Kit (Large)...

★★★☆☆ 134

2-day shipping

+ Add













Similar items you might like

Based on what customers bought

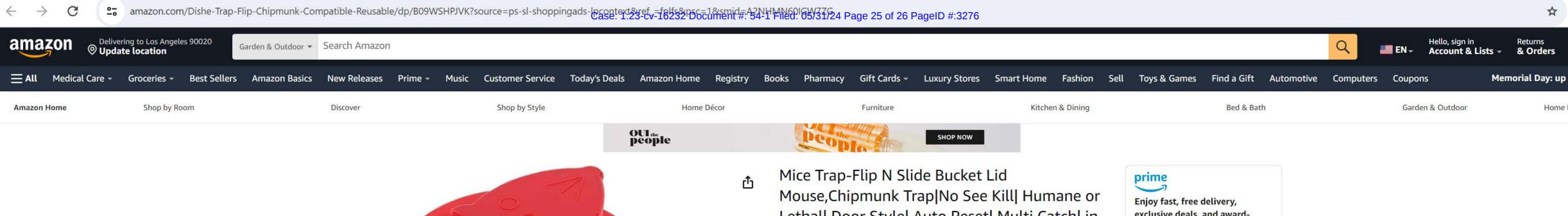


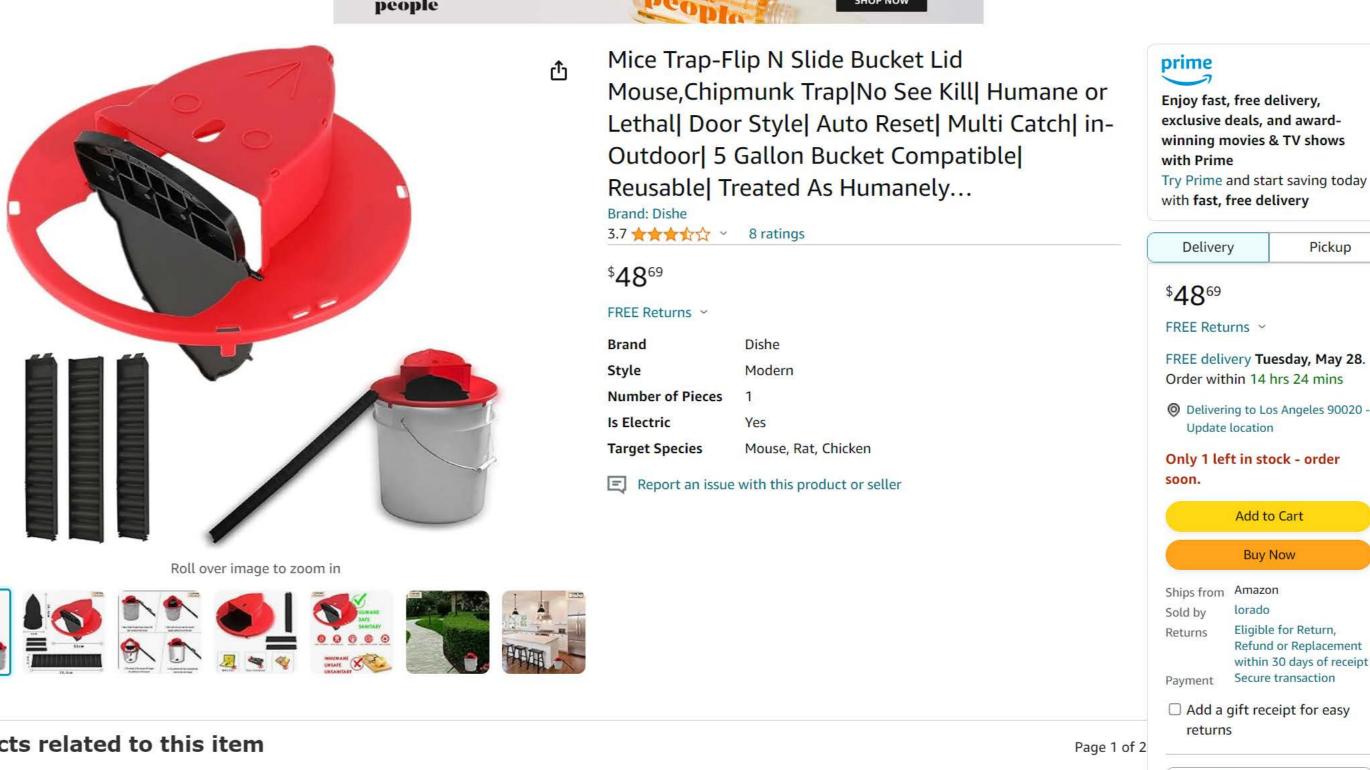












Products related to this item



Multi-Catch Mouse Traps Outdoor - Humane or Lethal Squirrel Traps - 5 Gallon Bucket... 3.0 ★★★☆☆ 85 \$4999

√prime



Gallon Bucket Lid Mouse Rat Trap 3 Pack -Automatic Reset Flip... 3.6 ★★★☆☆ 2,554 \$23⁸⁸ (\$7.96/Count) **√**prime



Gallon Bucket Lid Mouse Rat Trap 4 Pack -Automatic Reset Flip... \$28⁸⁸ (\$7.22/Count) √prime



Upgraded 5 Gallon Bucket Lid, Bucket Lid, Trapdoor Style, Indoor and Outdoor, Reusa... 3.2 ★★★☆☆ 417 \$12⁹⁸ √prime



LockNLube Grease Gun Coupler locks onto Zerk fittings. Grease goes in, not on the m... 4.7

#1 Best Seller \$3299

√prime

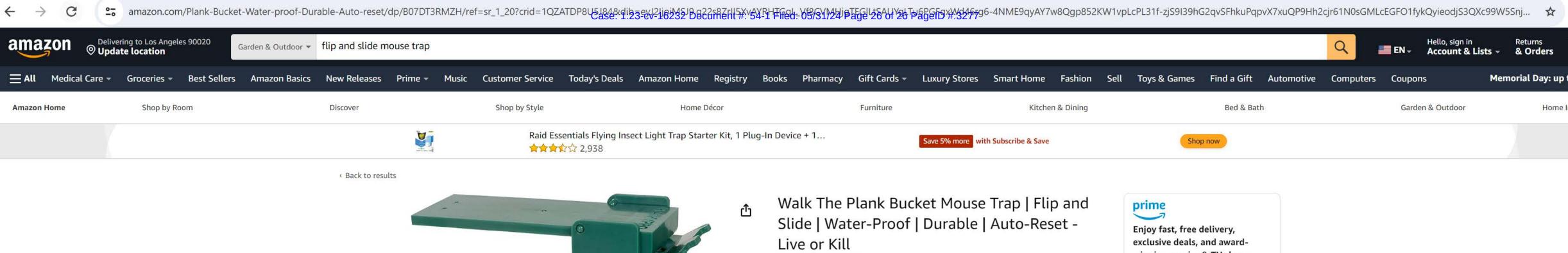


200PCS Barrel Snap Swivel Fishing Accessories, Premium Fishing Gear... 4.6

\$999

Add to List

√prime



















Brand: PLANKYPRO 3.9 ★★★★☆ ~ 775 ratings

50+ bought in past month

-10% **\$17**⁹⁹

List Price: \$19.99

Get Fast, Free Shipping with Amazon Prime

FREE Returns ~

Get \$10 off instantly: Pay \$7.99 \$17.99 upon approval for the Amazon Store Card. No annual fee.

Item Package Quantity: 1

Color: Black

PLANKYPRO Brand Color Black Plank Style Material Plastic Number of Pieces Is Electric No **Target Species** Mouse, Rat

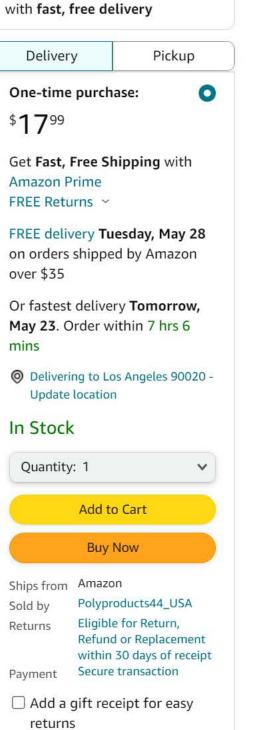
About this item

- AUTO RESET: The trap resets automatically. You can catch multiple mice at
- WATERPROOF: Unlike other traps in the market, our trap is made from durable waterproof plastic.
- POISON FREE: Simply use peanut butter or any other bait that can be stuck to the trap. Keeps your pets safe and out of danger.
- LIVE OR KILL: You have option of using the device as a live catch or to kill the mice. Use water in the bucket if you intend on not releasing the mice. Using fine sand or saw dust at the bottom prevents the mice from jumping out. Using taller bucket is help with the live catch.
- IMPORTANT (UNIVERSAL BODY): This plank included in this trap set is specifically calibrated for smaller mice. However a set including bigger plank is available for purchase. Additionally you can also just buy the bigger plank only if you already purchased the smaller trap set. The same UNIVERSAL BODY works with both plank.

Additional Details

winning movies & TV shows with Prime

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0

Subscribe & Save:

over \$35

\$1799 (\$17.99 / Count)

FREE delivery Tuesday, May 28

on orders shipped by Amazon